

Pastor Shane
And Lisa Philpott



Service Schedule:
Sundays At 10:30 am
Wednesdays At 7:00 pm

Breakfast Club:
Sundays From
9:00 to 10:00 am

The Edge Youth Center:
Wednesdays from
7:00 to 8:00 pm

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April 27, 2007

Office Of The Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 06-181; Case identifier No. CGB-CC-0487

I. The Nature And Cost Of Closed Captions

- A. Quotes of competitive pricing from multiple sources:
 - a. Media Images: \$199.00 per 30 minute program, \$299.00 per 60 minute program.
 - b. Smart Captioning: \$237.00 per 30 minute program, \$357.00 per 60 minute program.
 - c. Custom Captions: \$450.00 per 30 minute program, \$900.00 per 60 minute program.
 - d. Carr-Hughes Productions: \$275.00 per 30 minute program, \$550.00 per 60 minute program (plus \$50.00 per hour transcribing fee; takes approximately 5 hours to transcribe a 60 minute program).
 - e. KIMT-TV 3: \$5,440.00 for one year's worth of programming assuming one 30 minute program per week.
- B. Correspondence received from captioning companies:
 - a. Enclosed please find numerous price quotes from various companies, indicating a wide range in captioning prices.
 - b. All quotes listed above that are not enclosed were quoted in person with no written correspondence.
- C. Financial resources:
 - a. Christian Fellowship Church is a non-profit organization receiving its income strictly from congregational contributions.
 - b. We began airing "Faith In Action" in April of 2006. Since that time, we have received little or no financial support for our TV outreach. We are operating on the same income we have been operating on for years now (adjusted for normal inflation), but our expenses have dramatically increased due to production costs and airtime costs for "Faith In Action".
- D. Recouping the cost of closed captioning:
 - a. Pursuing grants or scholarships is not one of the requirements.

- b. Christian Fellowship Church would have to staff another person in order to have time to seek grants or sponsorship for captioning our program. Our budget does not allow for hiring another staff member, and our current staff does not have the time or resources available to do this.
- c. As a Christian program, we need to be extremely careful about who we allow to sponsor our program. In addition to that, it is impossible to know if our sponsor was conducting their business or themselves in a way that lines up with what we believe and preach every week on our television program.

II. The Impact On The Operation Of The Provider Or Program

- A. Christian Fellowship Church does not have closed captioning equipment, or the resources available to purchase this equipment. We would have to send the programs to an outside source for captioning. This would cause severe delays in how quickly we could air our program. Currently, we film our segment no earlier than 1 – 4 days before our deadline. We have just enough time to edit our program and deliver it to KIMT-TV 3 for airing without missing our deadline. Closed captioning our program would delay this process considerably, and would require us to air material weeks after it was filmed, in which case the material is usually already outdated or irrelevant.
- B. Furthermore, the added production costs of closed captioning “Faith In Action” would make the program unaffordable. Since we are currently airing four 30-minute episodes of “Faith In Action” every week with different services, we would have to caption more than one program every week. This would increase our closed captioning costs 200 to 400%. Christian Fellowship Church would have to discontinue programming and cease broadcast operations.
- C. If our program were to be closed captioned by an outside source, it would need to be viewed by our staff before airing to make sure there were no errors in typing. We have witnessed on television many times where words were left out, placed out of order, or in the worst possible case, a word was misspelled and then resembled a “curse word”. An error of this magnitude would devastate all that “Faith In Action” is trying to accomplish. Our staff members do not have the time available to preview every program after captioning, not to mention this would add more delay to airing our program.
- D. The costs involved in purchasing closed captioning equipment are not just limited to computers, equipment and software. It would also involve employment of a qualified individual at a competitive wage with benefits. Christian Fellowship Church does not have the resources available to hire qualified closed captioning personnel.

III. The Financial Resources Of The Provider Or Program Owner

- A. Christian Fellowship Church is currently operating off of the same income as in previous years (adjusted for inflation). However, we have chosen to allocate a certain percentage of our overall budget to the production and broadcasting of “Faith In Action”. Since we began airing “Faith In Action” in April of 2006, we have received little or no financial support for the airing of our television program. We have already allocated over 20% of our normal operating budget solely to the purchasing of airtime for “Faith In Action”. This does not include editing costs, purchases of equipment and software, or any other production costs. Adding the additional expense of closed captioning our program would further deplete an already stretched budget.
- B. Any funds that we would be required to use for closed captioning would have to be taken out of another area of our finances. This means that for every dollar we spend on captioning, some other area of Christian Fellowship Church’s operations would be adversely affected. Whether it’s a decrease in funds available for our Children’s Department or whether we can no longer support other missionaries, the money for captioning would have to come from somewhere.

IV. The Type Of Operation Of The Provider Or Program Owner

- A. "Faith In Action" is an outreach ministry of Christian Fellowship Church whose main purpose is to share the abundant life we have through Jesus Christ with our local community.
- B. Christian Fellowship Church is a non-profit organization whose income comes strictly from congregational contributions.

V. Conclusion

- A. According to our opposition, they claim that we did not provide sufficient information to be granted closed captioning exemption. We provided everything that was required to prove the "undue burden" standard and we were granted the exemption.
- B. We applied for closed captioning exemption before we ever began airing "Faith In Action". If we had been denied exemption and been required to closed caption our program, we never would have begun airing "Faith In Action" on television.
- C. We have been airing "Faith In Action" on KIMT-TV 3 for over a year now. In all that time, neither Christian Fellowship Church nor KIMT-TV 3 have received any complaints about our program not being closed captioned.
- D. In the year that we have been on the air, we have gained numerous followers. Many of these people consider this their church, whether they are able to attend or not. There are countless disabled persons who cannot leave their homes or nursing home in order to attend church. Watching "Faith In Action" is the only church these people are able to experience. Although we are very sympathetic to the hearing impaired, we are also concerned about the thousands of people who are not mobile enough to make it to a church service.
- E. For the reasons discussed above, we ask that the Federal Communications Commission uphold the exemption that was granted to us on the basis of the "undue burden" standard, 47 C.F.R. § 79.1(f). We are extremely grateful for this exemption. It has allowed us to reach thousands of people in our local area with the Good News about Jesus Christ for over a year now. This is something that has never been accomplished in this region, and it has been made possible solely through the giving of Christian Fellowship Church's congregation members, and through the exemption that was granted to us by the Federal Communications Commission.

We appreciate the time you have given to this matter. If you have any questions or concerns please feel free to contact us at:

Christian Fellowship Church
1181 15th Street SW
Mason City, IA 50401
(641) 423-0000

Sincerely,



Pastor Shane Philpott
President